

Message

From: Froede, Carl [Froede.Carl@epa.gov]
Sent: 7/29/2021 6:50:59 PM
To: Amoroso, Cathy [Amoroso.Cathy@epa.gov]; Richards, Jon M. [Richards.Jon@epa.gov]
Subject: RE: EMDF ROD Statement - TDEC Question...

I will include the issue in our comments on the ROD and include Cathy's comment below for needed clarification.

From: Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Sent: Thursday, July 29, 2021 2:48 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>; Froede, Carl <Froede.Carl@epa.gov>
Subject: RE: EMDF ROD Statement - TDEC Question...

I don't think we should be left guessing. They may be referring to the 25/75/25 dose in the NRC and state rules 10 *CFR* 61.41/TDEC 0400-20-11-.16(2).

Concentrations of radioactive material which may be released to the general environment in groundwater, surface water, air, soil, plants, or animals must not result in an annual dose exceeding an equivalent of 25 millirems to the whole body, 75 millirems to the thyroid, and 25 millirems to any other organ of any member of the public.⁵

And if so, that is different than what EPA considers the appropriate dose limit (12 mrem). Are we comfortable with that?

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Thursday, July 29, 2021 2:19 PM
To: Froede, Carl <Froede.Carl@epa.gov>; Amoroso, Cathy <Amoroso.Cathy@epa.gov>
Subject: RE: EMDF ROD Statement - TDEC Question...

Yes that's just saying the 10-5 risk from WAC is below or within our risk range of which 12 mrem is at the top of the risk range, or 3 E-4 risk per the '97 guidance they quote
And the 12/20 wheeler memo is for the discharges not the WAC

Jon Richards
Regional Radiation Expert & RPM
US EPA R4, SEMD
Richards.jon@epa.gov
404-431-1340

From: Froede, Carl <Froede.Carl@epa.gov>
Sent: Thursday, July 29, 2021 2:04 PM
To: Amoroso, Cathy <Amoroso.Cathy@epa.gov>; Richards, Jon M. <Richards.Jon@epa.gov>
Subject: FW: EMDF ROD Statement - TDEC Question...
Importance: High

Cathy/Jon:

Brad points out a ROD statement below that originally didn't bother me but now has me second guessing. Jon, I know that I have not received your comments on the EMDF ROD but could you please weigh in on this specific issue so that I can respond to Brad? Cathy, you are welcomed to weigh in too if you like. I will be out tomorrow but back on Monday.

Thanks for your help,

Carl

From: Brad Stephenson <Brad.Stephenson@tn.gov>

Sent: Thursday, July 29, 2021 1:16 PM

To: Froede, Carl <Froede.Carl@epa.gov>

Subject: EMDF ROD Statement

Carl,

As we review the ROD (slowly so far in my case), I want to make sure EPA evaluates this statement on p. 2-42:

The inventory (WAC) limits are the maximum values allowed per the ARAR dose for protection of the public, which has been deemed protective under CERCLA by EPA.

The associated footnote says:

EPA Administrator, *Dispute Resolution Decision on radiological discharge limits for the Oak Ridge Reservation*, December 31, 2020.

Franklin Hill, EPA Region 4 Superfund Division Director, *Regional Response to NRRB [National Remedy Review Board] Comments and Recommendations Oak Ridge Reservation Superfund Site*, Oak Ridge, Tennessee, April 19, 2018.

EPA Office of Solid Waste and Emergency Response, *Establishment of Cleanup Levels for CERCLA Sites with Radioactive Contamination*, OSWER No. 9200.4-18, August 22, 1997.

I welcome any feedback you can share on this point. At a minimum, I want to make sure EPA evaluates the statement in case a comment is warranted.

Thanks, and have a good weekend.



J. Brad Stephenson PG | Geologist/Environmental Consultant
Division of Remediation / Oak Ridge Office
761 Emory Valley Road, Oak Ridge, TN 37830
p. 865-220-6587
Brad.Stephenson@tn.gov
<http://www.tn.gov/environment>

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